



LAW OFFICES OF BARRY BLACK, P.C.

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December 16, 2015

Michael E. Kunz, Clerk of Court
US District Court, Eastern District of Pennsylvania
U.S. Courthouse
601 Market Street, Room 2609
Philadelphia, PA 19106-1797

Re: 2:12-cv-04135-MSG
IZKHAKOV v. EDUCATIONAL
COMMISSION FOR FOREIGN MEDICAL
GRADUATES

Dear Mr. Kunz:

In accordance with L.R.C.P. 5.1.5(c), Plaintiff Elena Izkhakov hereby objects to the unsealing of any and all documents in Case No. 2:12-cv-04135-MSG pursuant to the Court's 9/30/13 Sealing Order herein. The rationale for the Court's decision (that "Plaintiff has demonstrated that these docket entries contain confidential information pertaining to her eligibility to take the United States Medical Licensing Exam, have a high likelihood of causing her embarrassment and irreparable damage to her professional reputation" and that "the risk of harm to Plaintiff outweighs the public's interest in disclosure") continue to hold true. The underlying concern that internet searches generate links to the filings in question continue. A Google search as of this date generates "hits" to the two major internet resources in question on the very first results page. If unsealed, this would lead to the very damage to Dr. Izkhakov's professional reputation addressed by the Court in its ruling.

We respectfully object to any unsealing and request that the document be further sealed in perpetuity, given the unpredictable nature of technology and the internet (it is impossible to know when, if ever, these entries would be removed from said internet pages).

Very truly yours,


Barry Black